

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

RUSSELL MARTINEZ,

Plaintiff,

v.

**USDC Case No. 14-CV-00534 KG/WPL
District Court Case No. D-117-CV-2014-00159**

JOSEPH SALAZAR, et al.,

Defendants.

**SUPPLEMENTAL ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES
TO DEFENDANT JOSEPH SALAZAR**

COMES NOW Defendant Joseph Salazar, by and through his attorneys Basham & Basham, P.C. (Mark A. Basham) and for his Supplemental Answers to Plaintiff's First Set of Interrogatories to Defendant Joseph Salazar, states as follows:

INTERROGATORIES

Plf.'s Interrogatory No. 4 to Espanola Defs.: Please provide a full and detailed description of your educational history beginning with high school. Include in your answer all vocational training, certifications you have received, the years of attendance for each school, whether you graduated, and your grade-point average.

ANSWER:

Defendant Joseph Salazar is no longer employed by Defendant Espanola Department of Public Safety. City Defendants have attempted to locate Defendant Joseph Salazar without success. City Defendants reserve the right to supplement their Answer to this Interrogatory once Defendant Joseph Salazar has been located.

EXHIBIT G

SUPPLEMENTAL ANSWER:

City Defendants object to answering this Interrogatory since the Interrogatory seeks private and confidential information that is irrelevant to the issues in this suit. Without waiving said objection, see personnel file of Defendant Joseph Salazar, attached as City Def 000154-000253 to City Defendants' Supplemental Responses to Plaintiff's First Set of Requests of Production to Defendants City of Espanola and Espanola Department of Public Safety.

Plf.'s Interrogatory No. 5 to Espanola Defs.: Please provide a full and detailed description of your work history. Include in your answer the pay you received and your rank and job duties throughout your time with each employer, and for each employer that you no longer work for, the specific reason why you resigned or were terminated.

ANSWER:

Defendant Joseph Salazar is no longer employed by Defendant Espanola Department of Public Safety. City Defendants have attempted to locate Defendant Joseph Salazar without success. City Defendants reserve the right to supplement their Answer to this Interrogatory once Defendant Joseph Salazar has been located.

SUPPLEMENTAL ANSWER:

City Defendants object to answering this Interrogatory since the Interrogatory seeks private and confidential information that is irrelevant to the issues in this suit. Without waiving said objection, see personnel file of Defendant Joseph Salazar, attached as City Def 000154-000253 to City Defendants' Supplemental Responses to Plaintiff's First Set of Requests of Production to Defendants City of Espanola and Espanola Department of Public Safety.

Plf.'s Interrogatory No. 6 to Espanola Defs.: Please provide a full and detailed description of the training you have received as, or to become, a law enforcement officer. Include in your answer a list, by name, of all classes or courses that you have completed, the date you completed the class or course, the length of the class or course, who acted as the instructor for the class or course, and whether you have any certificates showing completion of any such class or course.

ANSWER:

Defendant Joseph Salazar is no longer employed by Defendant Espanola Department of Public Safety. City Defendants have attempted to locate Defendant Joseph Salazar without success. City Defendants reserve the right to supplement their Answer to this Interrogatory once Defendant Joseph Salazar has been located.

SUPPLEMENTAL ANSWER:

City Defendants object to answering this Interrogatory since the Interrogatory seeks private and confidential information that is irrelevant to the issues in this suit. Without waiving said objection, see personnel file of Defendant Joseph Salazar, attached as City Def 000151-000253 to City Defendants' Supplemental Responses to Plaintiff's First Set of Requests of Production to Defendants City of Espanola and Espanola Department of Public Safety.

Plf.'s Interrogatory No. 7 to Espanola Defs.: Please provide a full and detailed description of any disciplinary action that has been taken, or any grievance or complaint that has been lodged, against you in your capacity as a law enforcement officer, whether you were employed by the City of Espanola or elsewhere.

ANSWER:

Defendant Joseph Salazar is no longer employed by Defendant Espanola Department of Public Safety. City Defendants have attempted to locate Defendant Joseph Salazar without success. City Defendants reserve the right to supplement their Answer to this Interrogatory once Defendant Joseph Salazar has been located.

SUPPLEMENTAL ANSWER:

City Defendants object to answering this Interrogatory since the Interrogatory seeks private and confidential information that is irrelevant to the issues in this suit. Without waiving said objection, see personnel file of Defendant Joseph Salazar, attached as City Def 000154-000253 to City Defendants' Supplemental Responses to Plaintiff's First Set of Requests of Production to Defendants City of Espanola and Espanola Department of Public Safety.

Respectfully submitted by:

BASHAM & BASHAM, P.C.

/s/ Mark A. Basham

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